

REMARKS

By this amendment, claims 1, 13, 25 and 26 have been amended. Accordingly, claims 1-26 and 29 are currently pending in the application, of which claims 1, 13, 25 and 26 are independent claims.

Applicants respectfully submit that the above amendments do not add new matter to the application and are fully supported by the specification. Support for the amendment(s) and added claims may be found at least in Figure(s) 2 and 3 and at page 9, line 18 to page 11, line 7 of the specification.

Entry of the Amendments and Remarks is respectfully requested because entry of Amendment places the present application in condition for allowance, or in the alternative, better form for appeal. No new matters are believed to be added by these Amendments. In view of the above amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending objections and rejections for the reasons discussed below.

Rejections Under 35 U.S.C. § 103

In order to render a claim obvious, the combination of cited references must teach each and every element of the claimed invention and must provide teaching, motivation, or suggestion to combine. Nat'l Steel Car, Ltd. v. Canadian Pac. Rwy., 357 F.3d 1319, 1337 (Fed. Cir. 2004) (citing Ecocom, Inc. v. S. Cal. Edison Co., 227 F.3d 1361, 1371 (Fed. Cir. 2000)). This motivation must be based on the knowledge in the art, not knowledge provided by the application under examination, because such hindsight reconstruction is forbidden. In re Fine, 837 F.2d 1071, 1075 (Fed. Cir. 1988).

Ito et. al. (U.S. Patent No. 5,652,067)

Claims 1, 2, 4, 5, and 8-11 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 5,652,067 issued to Ito, *et al.* ("Ito"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1, as amended, recites:

"An organic light-emitting diode for a display...wherein the electron injecting layer is formed using a shadow mask such that the electron injecting layer overlaps the emissive layer without extending over the first and second ends of the anode layer and the emissive layer..."

Ito fails to teach or suggest each and every claimed feature of amended claim 1, more particularly, Ito fails to teach or suggest an electron injecting layer formed using a shadow mask such that the electron injecting layer overlaps the emissive layer without extending over the first and second ends of the anode layer and the emissive layer. Rather, Ito discloses an organic electroluminescent device, comprising an EITL layer (12) formed by methods other than a shadow mask deposition, which extends over an end of the anode layer (See Figure 2). Accordingly, the electron injection layer, formed by a shadow mask deposition, as disclosed in amended claim 1, forms a different product from the prior art (See MPEP §2113; *In re Marosi*, 218 USPQ 289, 292 (Fed. Cir. 1983)). Claims 2, 4, 5 and 8-11 depend from independent claim 1, and therefore are patentable for at least the aforementioned reasons.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 1, 2, 4, 5, and 8-11. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 1, and claims 2, 4, 5, and 8-11 that depend therefrom, are allowable.

Ito et. al. (U.S. Patent No. 5,652,067)

Claims 13, 14, 16, 17, and 20-23 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 5,652,067 issued to Ito, *et al.* ("Ito"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 13, as amended, recites:

"An organic light-emitting diode for a display...wherein the electron injecting layer is formed using a shadow mask such that the electron injecting layer overlaps the emissive layer without extending over the first and second ends of the anode layer and the emissive layer..."

For the same reasons presented above for amended claim 1, Ito fails to teach or suggest each and every claimed feature of amended claim 13. Claims 14, 16, 17 and 20-23 depend from independent claim 13, and therefore are patentable for at least the aforementioned reasons.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 13, 14, 16, 17, and 20-23. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claim 13, and claims 14, 16, 17, and 20-23 that depend therefrom, are allowable.

Ito et. al. (U.S. Patent No. 5,652,067) in view of Kaneko et. al. (JP 09-082476)

Claims 12 and 24 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 5,652,067 issued to Ito, *et al.* ("Ito") in view of Japanese Patent Application No. JP-09-082476, issued to Kaneko et. al. ("Kaneko"). Applicants respectfully traverse this rejection for at least the following reasons.

As noted above, Ito fails to teach each and every claimed feature of amended claims 1 and 13. Kaneko fails to cure the deficiencies of Ito. Accordingly, dependent claims 12 and 24

are allowable for at least the reasons discussed above with respect to independent claims 1 and 13.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 12 and 24. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that dependent claims 12 and 24 are allowable.

Ito et. al. (U.S. Patent No. 5,652,067) in view of Utsugi et. al. (U.S. Patent No. 5,837,391)

Claims 3 and 15 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 5,652,067 issued to Ito, et al. ("Ito") in view of (U.S. Patent No. 5,837,391), issued to Utsugi et. al. ("Utsugi"). Applicants respectfully traverse this rejection for at least the following reasons.

As noted above, Ito fails to teach each and every claimed feature of amended claims 1 and 13. Utsugi fails to cure the deficiencies of Ito. Accordingly, dependent claims 3 and 15 are allowable for at least the reasons discussed above with respect to independent claims 1 and 13.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 3 and 15. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that dependent claims 3 and 15 are allowable.

Ito et. al. (U.S. Patent No. 5,652,067) in view of Liao et. al. (U.S. Patent Publication No. 2003/0170491).

Claims 6, 7, 18, 19, 25, 26, and 29 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U. S. Patent No. 5,652,067 issued to Ito, et al. ("Ito") in view of U.S.

Patent Publication No. 2003/0170491, issued to Liao et. al. ("Liao"). Applicants respectfully traverse this rejection for at least the following reasons.

As noted above, Ito fails to teach each and every claimed feature of amended claims 1 and 13. Liao fails to cure the deficiencies of Ito. Rather, Liao discloses the use of an integral shadow mask for forming the cathode (See page 13, paragraph [0189]), but fails to disclose the use of a shadow mask for the electron injecting layer. Accordingly, dependent claims 6, 7, 18, and 19 are allowable for at least the reasons discussed above with respect to independent claims 1 and 13.

With respect to claims 25 and 26, amended claims 25 and 26 recite:

"A method of fabricating an organic-light emitting diode for a display...wherein a shadow mask is used to form the electron injecting layer such that the electron injecting layer overlaps the emissive layer without extending over the first and second ends of the anode layer and the emissive layer..."

For the same reasons presented above for amended claims 1, Ito fails to teach or suggest each and every claimed feature of amended claims 25 and 26. Liao fails to cure the deficiencies of Ito. Claim 29 depends from independent claim 26, and therefore is patentable for at least the aforementioned reasons.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. § 103(a) rejection of claims 6, 7, 18, 19, 25, 26, and 29. Since none of the other prior art of record, whether taken alone or in any combination, discloses or suggests all the features of the claimed invention, Applicants respectfully submit that independent claims 25 and 26 and dependent claims 6, 7, 18, 19, and 29, are allowable.

CONCLUSION

Applicants believe that a full and complete response has been made to the pending Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicants respectfully submit that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicants' undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

Respectfully submitted,

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